





LECHMAN AND JOHNSON, INC. 16201 TRADE ZONE AVENUE, SUITE 108 UPFER MARLBORG, MARYLAND 20772

SEPARATION STUDY

HARRISBURG, N.C.

Channel 224A 035-16-20 / 080-45-54 erp : 6.000 kw eah : 100 m

Designation	Channel (MHz)	Pertinent Allocation or Authorized Station	Separation Actual	Required
\sim				
Co-channel	224A (92.7)	Harrisburg, NC RM-7142	10.14	115 <u>1</u> /
		0.00 kw / 0 m	SHORT (-1	04.86 km)
		bearing from proposed = 40).96 deg	
1st Adjacent	2220	Greenville, SC	168.54	165
130 Ma.jacanio	(92.5)	WINDOW OPEN.	100.04	100
		035- 8-16 / 082-36-31 0.00 kw / 0 m	CLEAR (3.54 km)
		bearing from proposed = 26	5.43 deg	
st Adjacent	2230	WESCFM, Greenville, SC	168.54	165
	(92.5)	BLH-800 8 11AB 035- 8-16 / 082-36-31	CLEAR (3.54 km)
		95.00 kw / 610 m bearing from proposed = 26	5.43 deg	
1st Adjacent	2250 (92.9)	Dillon, SC WINDOW OPEN,	165.43	165
		034-21-53 / 079-19-49 0.00 kw / 0 m	CLEAR (0.43 km)
		bearing from proposed = 12	:7.20 deg	
1st Adjacent	2250	WZNS, Dillon, SC	165.43	165
•	(92.9)	BLH-860811KB		
		034-21-53 / 079-19-49 100.00 kw / 549 m	CLEAR (0.43 km)
		bearing from proposed = 12	7.20 d e g	

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1st Adjacent	22 5 C (92.9)	NEW, Dillon, SC BPH-881101MI 034-21-53 / 079-19-49 100.00 kw / 549 m bearing from proposed =	
2nd Adjacent	222C (92.3)	WKRR, Asheboro, NC BLH-851227KB 035-49-59 / 079-50- 2 100.00 kw / 393 m bearing from proposed =	95 9.88 km)
2nd Adjacent	222C (92.3)	Asheboro, NC WINDOW OFEN, 035-49-59 / 079-50- 2 0.00 kw / 0 m bearing from proposed =	95 9.88 km)

END OF STUDY

 $[\]underline{1}/$ The subject proposal is for the Harrisburg, NC allocation.

EXHIBIT VB-5

INTERFERENCE STATEMENT

SATURDAY COMMUNICATIONS LIMITED PARTNERS APPLICATION FOR CONSTRUCTION PERMIT HARRISBURG, NORTH CAROLINA

Channel 224A 6.0 kW (H & V) 100 Meters

The proposed operation is not expected to have any adverse effect upon any communication facilities located in the general vicinity. The applicant will address all complaints of alleged interference within its blanketing contour as established by Section 73.318 of the Rules and resolve such complaints satisfactory to the complainant provided the device that is malfunctioning is not excluded from the evaluation. The applicant's telecommunications consultant is not aware of any cable headend facilities within the blanketing contour. The proposed operation is not expected to cause receiver-incuded intermodulation interference within 10 km of the proposed site. If any RITOIE occurs as a result of the installation of the proposed facilities, the applicant will take steps to resolve such alleged interferences. The proposed facility is not expected to cause RITOIE.

Should interference occur due to the direct results of the construction of this FM facility, the applicant will take the necessary steps to correct the interference and resolve the issue of interference.

EXHIBIT VB-6

RADIOFREQUENCY RADIATION STUDY

SATURDAY COMMUNICATIONS LIMITED PARTNERS APPLICATION FOR CONSTRUCTION PERMIT HARRISBURG, NORTH CAROLINA

Channel 224A 6.0 kW (H & V) 100 Meters

The following calculations were performed in order to determine, whether the proposed FM station has a significant environmental effect.

Computations

FM Facilities

The calculations to determine power densities (mW/cm²) and power density levels of FM facilities are computed by using the following equation:

Power density in mW/cm^2 (S) =

(0.64) (1.64) (Total ERP in Watts)(1000 MilliWatts/Watt) $\pi \text{ (Center of Radiation in cm)}^2$

For the proposed FM facility, the total ERP is 12.0 kW and the center of radiation is 67.3 m. Therefore, the power density for the proposed FM facility at the base of the proposed tower is 0.0885 mW/cm^2 .

Conclusion

The computation of the power density for the proposed FM station was performed in accordance with OST Bulletin No. 65, Evaluating Compliance with FCC specified Guidelines for Human Exposure to Radiofrequency Radiation. The total power density of the proposed FM facility is 0.0885 mW/cm². Since this value is less than 1.0 mW/cm², the proposed facility is in compliance with OST Bulletin No. 65 and the ANSI standards. A fence will be constructed around the tower to secure the area and restrict unauthorized access to the tower site; should technical personnel or any authorized person or persons be required to access the tower, power to the site will be reduced or turned off, as necessary, to comply with ANSI guidelines and FCC Rules and Regulations concerning human exposure to radiofrequency radiation.

EXHIBIT VB-7

Before the Federal Communications Commission Washington, D.C. 20554

MM Docket No. 89-594

In the Matter of

Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations. (Harrisburg and Albemarle, North Carolina)¹

RM-7142 RM-7318

REPORT AND ORDER (Proceeding Terminated)

Adopted: December 31, 1991; Released: January 9, 1992

By the Assistant Chief, Allocations Branch:

1. At the request of York David Anthony ("petitioner"). the Commission has before it the Notice of Proposed Rule Making, 5 FCC Red 12 (1990), proposing the allotment of Channel 224A to Harrisburg, North Carolina, as the community's first local FM service. Petitioner filed comments supporting the allotment and restating his intention to apply for the channel, if allotted. Piedmont Crescent Communications, Inc. ("Piedmont"), licensee of Stations WEGO(AM), Concord, North Carolina, and WABZ-FM. Albemarle, North Carolina, filed a counterproposal requesting the substitution of Channel 264A for Channel 265A at Albemarle, North Carolina, the reallotment of Channel 264A to Harrisburg, and the modification of its license for Station WABZ-FM accordingly.2 Petitioner filed reply comments supporting Piedmont's counterproposal and restating his interest in Channel 224A.

- 2. Piedmont states that Station WABZ-FM operates with 3 kilowatts of power at 61 meters height above average terrain and is a grandfathered short-spaced station to first adjacent Station WPCM. Channel 266C. Burlington, North Carolina, and to Station WWWB, Channel 262C. High Point, North Carolina, As a result, it submits that Station WABZ-FM's present interference-free service area encompasses only 396 square kilometers as compared to a fully-spaced 3 kilowatt station's interference-free service area of 1.809 square kilometers. Further, the station's 60 dBu contour covers an additional 203 square kilometers but this area receives interference from Station WPCM at Burlington. Piedmont states that it has unsuccessfully attempted to relocate the transmitter away from Burlington and High Point. Therefore, it believes that the public interest would be served by reallotting Station WABZ-FM to Harrishurg because it would eliminate the shortspacings and enable the station to improve its facilities while also providing Harrisburg with its first local FM transmission service. Piedmont claims that the change in community would result in the provision of an additional FM reception service to approximately 93,200 persons in Cabarrus and Stanly Counties, North Carolina, and additional service to Mecklenburg, Union, Iredell, Anson and Rowan Counties as well.
- 3. As to the aural service remaining at Albemarle, Piedmont states that two full-time AM stations will continue to provide the community with local aural transmission service. In addition, Piedmont submits that Albemarle receives a 60 dBu or greater signal from 11 FM stations and a 500 uV/m or better signal from 15 AM stations. Piedmont also submits that Station WABZ-FM will continue to provide service to approximately one-third of its present service area. Therefore, it argues that reallotting Station WABZ-FM to Harrisburg will have only a minimal effect on the diversity of program choices.
- 4. We have reviewed the proposals before us and find that the public interest would be served by allotting at least one FM channel to Harrisburg as the community's first local FM transmission and first local aural service. We believe that the public interest is best served by providing this first local FM transmission service by the

A counterproposal is a proposal for an alternative and mutually exclusive allotment or set of allotments in the context of the proceeding in which the proposal is made. See, e.g., Implementation of BC Docket 89-90 to Increase the Availability of FM Broadcast Assignments, 5 FCC Rcd 931 (1990). In this case, there is no technical conflict between the two requests. However, the proposals are interrelated, as both proposals seek to provide Harrisburg with its first local FM transmission service. The grant or denial of either request would change the character of the remaining request. Therefore, we must determine whether the public interest is served by providing Harrisburg with its first local transmission service or its first and second

local transmission service. Further, if only one allotment can be justified, a decision on whether the first local service should be provided by granting the drop-in proposal or the reallotment proposal must be made. Therefore, we believe these proposals should be considered simultaneously. For administrative ease, we have considered this proposal as a "counterproposal" for the purpose of giving public notice and setting forth a response period.

After the record closed, the Trustees of Davidson College ("Trustees"), licensee of noncommercial educational FM Station WDAV. Davidson, North Carolina, filed an Informal Objection to Piedmont's counterproposal. Petitioner and Piedmont jointly filed a Motion to Strike and Reply to Objection of Davidson College. However, in light of the Trustees' subsequent withdrawal of their Informal Objection, these pleadings will not be considered.

The community of Albemarle has been added to the caption.

Public Notice of Piedmont's counterproposal was given on March 15, 1990, Report No. 1810. Piedmont originally filed comments supporting the allotment of Channel 224A at Harrisburg and stating an intention to apply for the channel. These comments were withdrawn with the filing of its counterproposal.

allotment of Channel 224A. There is no technical impediment or opposition to the allotment and petitioner has restated his intention to apply for the channel.3

- 5. We now turn to Piedmont's request to substitute Channel 264A for Channel 265A at Albemarle and reallot the channel to Harrisburg. The Commission evaluates the public interest benefits pursuant to the FM allotment priorities. These priorities are (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 (1982). Piedmont does not claim any first or second aural service benefit from the allotment of Channel 265A to Harrisburg and the community will receive its first local service when Channel 224A is activated. Therefore, Piedmont's request will be analyzed within the context of the fourth priority, other public interest matters.
- 6. In comparing the two communities, we find that Harrisburg has a 1980 U.S. Census population of 1,433 persons and is located 21.4 kilometers (13.3 miles) northeast of Charlotte, North Carolina, Harrisburg, which has no operating local aural transmission services, receives aural service from 13 FM and 10 AM services. Albemarle, on the other hand, has a population of 15,100 persons and is located 61.8 kilometers (38.4 miles) east of Charlotte. Albemarle receives local aural transmission service from one FM and two AM stations and reception service from 13 FM and 3 AM services. Based on our review of Piedmont's proposal, we find that the reallotment of Channel 264A to Harrisburg would offer public interest benefits. It would remove grandfathered short-spacings to Stations WPCM and WWWB and it would permit Station WABZ-FM to operate as a six kilowatt Class A station. In addition, a Commission staff engineering analysis indicates that the change in community, in conjunction with the operation of Station WABZ-FM as a six kilowatt facility. would permit Station WABZ-FM to serve some 327,012 additional persons in Rowan, Cabarrus, Mecklenburg, Stanly and Union Counties.
- 7. However, our analysis also indicates that removal of the station from Albemarle will result in a loss of service to some 56.396 persons in Stanly, Rowan, Davidson and Montgomery Counties. Furthermore, the vast majority of persons residing within the gain area, approximately 291,000 of the 327,012 persons, are in Cabarrus and Mecklenburg Counties, and are presently served by thirteen full-time aural reception services. Therefore, only 36.012 persons in the gain area are currently served by fewer than thirteen reception services. In addition, although Piedmont claims that it has been unsuccessful in improving service at its present location, we note that it has an application pending to relocate its transmitter and improve its facilities.4 According to the engineering supplement to Piedmont's counterproposal, the application fully complies with the Commission's Rules and, if grant-

ed, will enable Station WABZ-FM to operate with 6 kW of power and provide interference free service to an area of 1,000 square kilometers instead of its present 396 square kilometers.

- 8. The Commission has stated." The public has a legitimate expectation that existing service will continue, and this expectation is a factor we must weigh independently against the service benefits that may result from reallotting of a channel from one community to another." See Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094, 7097 (1990); see also Report and Order (Eatonton and Sandy Springs, Georgia; Annision and Lineville, Alabama), 6 FCC Red 6580 (1991), app. for rev. pend. In this instance, the public interest benefits of Piedmont's proposal are counterbalanced by the fact that over 56,000 persons would lose Station WABZ-FM's signal. The benefits are further diminished by the fact that approximately 89 percent of the gain area that would result from the change in community is currently served by thirteen fulltime aural reception services. We do not believe that the public interest would be served by allotting Harrisburg its second local FM transmission service by removing the third local aural transmission service from Albemarle, a community 10 times larger, and the consequent loss of reception service to over 56,000 persons. Therefore, we will deny Piedmont's proposal.
- 9. Channel 224A can be allotted to Harrisburg in compliance with the Commission's minimum distance separation requirements with a site restriction of 4.3 kilometers (2.7 miles) northwest to avoid short-spacings to Station WKRR, Channel 222C, Asheboro, North Carolina, and Station WZNS, Channel 225C, Dillon, South Carolina.⁶
- 10. Accordingly, pursuant to the authority contained in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61, 0.204(b) and 0.283 of the Commission's Rules, IT IS ORDERED. That effective February 24, 1992, the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, IS AMENDED, with respect to the community listed below, to read as follows:

Channel No. Harrisburg, North Carolina

11. The window period for filing applications will open on February 25, 1992, and close on March 26, 1992.

224A

12. IT IS FURTHER ORDERED, That the counterproposal of Piedmont Crescent Communications. Inc., to substitute Channel 265A for Channel 264A at Albemarle. North Carolina, reallot Channel 265A to Harrisburg. North Carolina, and modify the license of Station WABZ-FM accordingly (RM-7318), IS DENIED.

tioner's proposal.

³ We recognize that the engineering portion of Piedmont's counterproposal was prepared by the petitioner and contains the statement that the counterproposal is to be considered "either in lieu of, or in addition to," petitioner's proposal. However, because the petitioner filed both comments and reply comments supporting the allotment of Channel 224A to Harrisburg and reiterated his intention to apply for the channel, we believe that this statement does not constitute a withdrawal of the peti-

Piedmont's application has been accepted for filing (File No. BPH-900412IG).

See Engineering Supplement to Piedmont's counterproposal, p.2, n.1-2.

The coordinates for Channel 224A at Harrisburg are North Latitude 35-20-28 and West Longitude 80-41-30.

- 13. IT IS FURTHER ORDERED. That this proceeding IS TERMINATED.
- 14. For further information concerning this proceeding, contact Leslie K. Shapiro, Mass Media Bureau. (202) 634-6530.

FEDERAL COMMUNICATIONS COMMISSION

Michael C. Ruger Assistant Chief, Allocations Branch Policy and Rules Division Mass Media Bureau

SECTION VI - EQUAL EMPLOYMENT OPPORTUNITY PROGRAM X Yes 1. Does the applicant propose to employ five or more full-time employees? If Yes, the applicant must include an EEO program called for in the separate Broadcast Equal Employment Opportunity Program Report (FCC 398-A). SECTION VII - CERTIFICATIONS 1. Has or will the applicant comply with the public notice requirement of 47 C.F.R. Section 73.3580? 2. Has the applicant reasonable assurance, in good faith, that the site or structure proposed in Section X Yes V of this form, as the location of its transmitting antenna, will be available to the applicant for the applicant's intended purpose? Exhibit No. If No. attach as an Exhibit, a full explantion. 3. If reasonable assurance is not based on applicant's ownership of the proposed site or structure, applicant certifies that it has obtained such reasonable assurance by contacting the owner or person possessing control of the site or structure. Name of Person Contacted MR. Cliff Link (704)336-3497 Telephone No. linclude area codel Person contacted: Icheck one ben belee!

Note: Contact was made by TELSA, Inc. , agent for the applicant.

Other (specify)

Site assurance has been assigned to the applicant.

X Owner's Agent

Owner

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as emended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.

The APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with 47 C.F.R. Section 1.65, the APPLICANT has a continuing obligation to advise the Commission, through amendments, of any substantial and significant changes in information furnished.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE, TITLE 18, SECTION 1001.

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant Saturday Communications Limited Partnersh	ip Dand Cr Bells
Date De March 1992	Title David C. belton, President of Saturday Broadcasting Company, General Partner of Saturday Communications Limited Partnership

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

Public reporting burden for this collection of information is estimated to vary from 71 hours 45 minutes to 301 hours 30 minutes with an average of 118 hours 28 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Office of Managing Director, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0027), Washington, D.C. 20503.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552m(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

Exhibit 1.

Saturday Communications Limited Partnership Channel 224A Harrisburg, North Carolina

OTHER MEDIA INTERESTS

Dr. Spurgeon Webber III was the sole limited partner in Central Broadcasting Company, A Limited Partnership ("Central"), an applicant for a new FM station at Englewood, Ohio (File No. ZBPH-890928MM). The application was dismissed on March 12, 1991 by the Presiding Judge in MM Docket No. 91-11.

Central was also the applicant for a new FM station at Marysville, Ohio (BPH-871203NV), which application was dismissed by the Commission pursuant to a settlement agreement on November 14, 1989.

Dr. Webber is a limited partner in South Central Broadcasting Company Limited Partnership ("South Central"), an applicant for a new FM station at Zebulon, Georgia (File No. BPH-900418MK). Pursuant to a settlement agreement, South Central acquired a 25% equity interest and became the sole limited partner of Spalding Broadcasting L.P. which was granted a construction permit by an administrative law judge on September 9, 1991 (MM Docket No. 91-184). An application for review is pending with respect to this grant.

Dr. Webber is a limited partner in Zolfo Springs Broadcasting Limited Partnership ("Zolfo"), an applicant for a new FM broadcast station at Zolfo Springs, Florida (File No. BPH-910503MQ), filed May 3, 1991. Pursuant to a settlement agreement, the Commission has been requested to dismiss the Zolfo application.

Dr. Webber is a limited partner in Westerville Broadcasting Company Limited Partnership, an applicant for a new FM broadcast station at Westerville, Ohio (BPH-911231MB), filed December 31, 1991. The application has not yet been designated for hearing.

Dr. Webber is one of two General Partners in Webber/Moore Broadcasting Company Limited Partnership, an applicant for a new television station to operate on Channel 35, Jacksonville, North Carolina (BPCT-920114KG). The application, filed January 14, 1992, has not yet been designated for hearing.

Exhibit 2

Saturday Communications Limited Partnership Channel 224A Harrisburg, North Carolina

PROPOSED PROGRAMMING

The proposed station will employ a quarterly issues/programs list. It will use this list to identify problems and needs of concern to Harrisburg and surrounding communities and programs it has broadcast in response to those problems and needs.

The station will provide informational programming to Harrisburg and the surrounding area. It will broadcast a predominately music format, with regular public service announcements, weekday morning newscasts, and public affairs programming to serve the informational needs of the public.

The station will adhere to all programming regulations and guidelines contained, expressly or impliedly, in the Commission's Rules and the Communications Act.

The station will be equipped with emergency power generators at the studio and transmitter site so that the station can continue to provide service to the community during an emergency such as a power outage due to severe weather.

Saturday Communications Limited Partnership Channel 224A Harrisburg, North Carolina

STATEMENT OF INTEGRATION

David Belton, the President of Saturday Broadcasting Company, which is the sole General Partner of Saturday Communications Limited Partnership, will work at the station as General Manager on a full-time basis (at least 40 hours per week). In that position, Mr. Belton will ultimately be responsible for all management, administrative, programming, employment, and budgetary decisions relating to the operation of the station.

Ms. Belton will resign all other employment in order to fulfill his integration commitment.

Mr. Belton is a Black American.

If Saturday Communications Limited Partnership receives the Channel 224A construction permit, Mr. Belton will move to Harrisburg to construct and operate the proposed station. He will continue to operate the station fulltime for a period of at least three years, and Saturday Communications Limited Partnership will continue to own the station for at least three years.

Mr. Belton has livedin Charlotte, North Carolina (within the service area of the proposed station) in 1953. He resided in Charlotte until 1977 except for the period 1971-1975 when he resided from September through May of each such year in Chapel Hill, North Carolina while enrolled at the University of North Carolina. During the time he was enrolled at the University of North Carolina, he remained a permanent resident of Charlotte. He again resided in Charlotte from 1985 to 1987. In 1987, he moved to a residence situated across the street from the Charlotte city limits, while still maintaining a Charlotte mailing address. All of these residences (except Chapel Hill) are within the 60 dbu coverage area of the proposed station.

Mr. Belton has had, and continues to enjoy extensive and long term involvement in civic and community service organizations within the station's service area, including organizations serving residents of Harrisburg.

BROADCAST EQUAL EMPLOYMENT OPPORTUNITY MODEL PROGRAM REPORT

1. APPLICANT		
Name of Applicant Saturday Communications Limited Partnership	Address 9929 Elm Creek Lane Charlotte, NC 28277	
Telephone Number (include area code)		
(704) 542-2711		
2. This form is being submitted in conjunction with:		
X Application for Construction Permit for New Station	Application for Assignment of License	
Application for Transfer of Control		
(a) Call lessers for changel number of frequency) Chann	el 224A	
(b) Community of License (city and state) Harri	sburg, North Carolina	
(C) Service: AM TV C	Other (Specify)	
INSTRU	CTIONS	
hat is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American the Commission as the Model EEO Program. If minority group representage aggregate), a program for minority group members is not required. If EEO model program. However, a program must be filed for worm the forces. If an applicant proposes to employ fewer than five seed be filed.	sentation in the available labor force is less than five percent (i . In such cases, a statement so indicating must be set forth it sen since they comprise a significant percentage of virtually a	
Guidelines for a Model EEO Program	and a Model EEO Program are attached.	
IOTE: Check appropriate box, sign the certification—below and retu	rn to FCC:	
Station will employ fewer than 5 full-time employees; therefor	re no written program is being submitted.	
Station will employ 5 or more full-time employees. Our Mod sections of this form.)	el EEO Program is attached. (You must complete all	
certify that the statements made herein are true, complete, and correct good faith.	et to the best of my knowledge and belief, and are made	
Signed and dated this Signed Title David C.	ind C Blan Belton, President, Saturday Broadcasting	
	General Partner of Saturday Communications Partnership	

Saturday Communications Limited Partnership Channel 224A Harrisburg, North Carolina

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

1) **GENERAL POLICY**

It will be our policy to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy more effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements.

2) RESPONSIBILITY FOR IMPLEMENTATION

David Belton, General Manager, will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

3) POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

- a) The station's employment application form will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, state or federal agency if they believe they have been the victims of discrimination.
- b) Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, state or federal agency if they believe they have been the victims of discrimination.

c) We will seek the cooperation of unions, if represented at the station, to help implement our EEO program. All union contracts will contain a nondiscrimination clause.

4) RECRUITMENT

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration in filling job vacancies, we propose to utilize the following recruitment procedures on each occasion on which we have a hiring opportunity:

a) We will attempt to maintain systematic communication, both orally and in writing, with a variety of minority and women's organizations to encourage the referral of qualified minority and female applicants. Examples of organizations we intend to contact are:

Urban League, National Association for the Advancement of Colored People, First Friday of Charlotte, Charlotte Business League, Westside Business Merchants Association, etc.

b) In addition to the organizations noted above, which specialize in minority and female candidates, we will deal only with employment services, including state employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. An example of such an employment service is:

Job Employment Security.

c) When we recruit prospective employees from educational institutions, such recruitment efforts will include schools and colleges with significant minority and female enrollments. Educational institutions to be contacted for recruitment purposes include:

Johnson C. Smith University, North Carolina A&T State University, South Carolina State University, North Carolina Central University Winthrop University, etc.

- d) When utilizing media for recruitment purposes, help-wanted advertisements will always include a notice that we are an Equal Opportunity Employer and will contain no indication, either explicit or implied, of a preference for one sex over another.
- e) When we place employment advertisements in print or broadcast media, some of such advertisements will be placed in media which have significant circulation or listenership, or are of particular interest, to minorities and women. Examples of media to be utilized are:

f) We will encourage employees, particularly minority and female employees, to refer minority and female candidates for job openings.

5) <u>TRAINING</u>

We will provide on-the-job training to upgrade the skills of employees.